WCBD in Charleston has, for fifty years, served well the residents in the surrounding eleven counties that comprise the South Carolina Lowcountry. Our commitments to the Code of Ethics, our adherence to the Standards and Practices of Broadcasters, and our respect for the license we hold to serve in the public interest are assuredly foremost in our minds as we bring our message forth. To address the points that the NAB has suggested the Commission is most interested in, please consider the following brief outlining of specific areas of performance. We will be happy to provide specific examples in greater detail at the Commissions request, and of course, our public files are always available.

Local News: We are currently spending a healthy six figures a year directly on our news products. We have a staff of 37 individuals, both full and part time, who report to our News Director. We generate, from our studios, 49 full half hours of news programming every week and also have live local cut-ins during NBC's morning programming that weekly constitute an additional 4 half hours of news, weather and information.

Depending on the day in question, and considering the network news and news magazine programming that we carry, our broadcast day may be as much as 35% "news". Within the last year we have, in fact, added an additional hour of news to our broadcast day with the expansion of our morning news and the launch of a noon news show that is also a half hour in length.

Our station Website offers viewers expanded coverage of stories, allows for live streaming video, and serves to inform the public on dozens of topics and community "bulletin board" types of information, while maintaining archival files on hundreds of news stories.

Covering the community is one of our main core values. We do this with the volume of newscasts and the opportunities made available to the public to be on air, specifically in the early morning and noon programs, we feel this aspect of our presentation is fully served. Our newscasts routinely discuss local issues and community affairs and in many instances we have experts manning a phone bank to answer questions on health related stories and on other occasions when we believe the story aired may generate interest among viewers to immediately receive additional information.

This station does indeed maintain an open door policy of availability to anyone in the public to comment on or present ideas for enhancing or upgrading the programs that we air. Our general manager takes such calls, emails and has meetings with groups or individuals as warranted.

Regarding a specific time when the station preempted regularly scheduled programming to present programming of more interest to our viewers, at the end of August of this year we put on an hour long special on a trip by a group of locals educators to the west coast of Africa. The station sent one of our reporters and our chief photographer to Ghana to cover the story. The special presentation aired in addition to the numerous news packages that were aired and fleshed out the issues raised to a much deeper level and gave our audience an in depth look at the journey undertaken and the many good things that came from this adventure. The program will be rebroadcast during the holiday season ahead.

With regard to emergency programming, being a coastal community, we are the areas first choice to tune to when hurricanes threaten our region. This past August and September, we provided to our viewers extensive coverage and breaking weather information. On August 1, 2004, we preempted regularly schedule

programming to provide more than five (5) hours of straight emergency coverage when Tropical Storm Alex threatened our viewing area. On August 14, 2004, we provided more than four (4) hours of continuous coverage of Hurricane Charlie. And on August 28, 2004, we took to our airwaves to provide more than eight (8) hours of emergency coverage when Tropical Storm Gaston made landfall in our viewing area.

We have also made a significant investment in weather forecasting equipment. Within the past year we purchased a new tool to provide the most accurate and dependable weather forecasting to our viewers: Baron's VIPIR, a revolutionary new standard in storm tracking accuracy. The VIPIR (Volumetric Imaging and Processing of Integrated Radar) system is a 3-D weather tool that uses patented mathematical analysis, continuous live scanning, and unmatched display capability. Multiple radar installations across the Lowcountry continuously scan the atmosphere. That information feeds into our forecast center. Our meteorologists watch for special alert symbols called "Shear Markers" that identify "Dangerous Twisting of the Winds." We can now track weather systems instantaneously, in real-time 3-D, using VIPIR to punch inside a storm. We analyze it from every angle and look at the upper levels of a storm system, where strong winds and hail form ... where tornadoes begin! This information gets to our viewers without delay, and gives families the time they need to seek shelter and stay safe.

We also alerts viewers to weather and other emergencies though our Website, counton2.com, and our "Infolerts," informational e-mail alerts sent to Counton2.com subscribers as "pop-up" text messages. "Infolerts" (info-lerts) assist in driving viewers to newscasts as well as immediately advising viewers of breaking news and severe weather situations. A prime example of how we respond to breaking news through Counton2.com was when a four-year-old disappeared on Christmas Day 2003. WCBD posted on article on Counton2.com and sent out an "Infolert" about the missing child and we asked for help in the search. Hundreds of volunteers and law enforcement officers searched on Christmas night and well into the next day. This story ended happily as the child was found safe and sound.

We are also an active participant in the nationwide AMBER alert system.

During this recent political season we have done numerous stories on local, statewide and national political races and issues, including the airing of two live debates from our studios during our 5pm newscasts between opponents and advocates of our state's mini-bottle and half-cents sales tax issues. We have also made available free airtime during our newscasts for local political candidates to discuss their position on key issues. And we preempted regular programming to air a live debate between South Carolina's US Senatorial candidates. Furthermore, on our website, counton2.com, we provide to our viewers more in-depth knowledge and information beyond what is contained in a newscast, including help locating voting regulations, candidate profiles, and streaming Video of debates and interviews.

We also extensively covers civic, cultural, music, and other community-responsive programming, including Unity Day, Charleston Police bringing community together for a picnic to form a better relationship July 31, 2004; Charleston Museum of Art Ballet Preview 7-10-04; Martin Luther King Breakfast YWCA 9-20-04; and extensive coverage of the Moja Arts and Spoleto Festivals.

We support a number of local and nation al charities and not-for-profit initiatives. This past year we helped raise a record amount of money for the

Carolina Children's Charity (a local non-profit organization that financially assists children with disabilities) through our annual Carolina Children's Charity telethon - an astounding \$282,000! We broadcast the United Negro College Fund "Parade of Stars" telethon.

We are particularly active in support of the American Red Cross. We help to organize and support four quarterly blood drives for The American Red Cross-"The Count on 2 Blood Drive Blitzes." And during this hurricane season's devastating series of storms, we produced and aired a PSA encouraging viewers to make monetary donations to the American Red Cross Disaster Relief Fund. This past March our station was presented with the prestigious Red Cross "Good Neighbor Award." The "Good Neighbor Award" goes to an individual or organization outside the Red Cross that has made a significant humanitarian contribution to the local, national, or international community in support of the Red Cross.

We also support the local efforts for a number of national events, including The MS Walk, The Walk for the Cure, The American Heart Walk, and the annual "First Day of School Festival," which encourages parental involvement with school education. We supports all of these initiatives with on-air support and station staff participation.

We are proud of our commitment to our viewers and our local community.

Respectfully submitted by Richard Fordham, Vice President and General Manager, WCBD-TV, 11-1-04